

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:)	Case No. 10-18033
)	
AJMAL JAHED)	Chapter 7
)	
Debtor.)	

MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR

COMES NOW, counsel for Debtor, Amir Raminpour, and respectfully requests that this Court grant his Motion to Withdraw as Counsel for Debtor pursuant to Local Bankruptcy Rule 2092-1(G). In support of his Motion, counsel states as follows:

1. Debtor first met with Counsel on September 20, 2010.
2. Counsel began to prepare the bankruptcy petition based on documents provided and the representations made to counsel.
3. Debtor and counsel met a second time on September 22, 2010, in counsel's office to review Debtor's bankruptcy petition and to make any necessary corrections.
4. Debtor made no corrections and found all information contained in the bankruptcy petition and schedules to be correct and accurate.
5. On September 23, 2010, counsel for Debtor filed Debtor's voluntary petition through the ECF system.
6. The meeting of creditors was originally set for November 1, 2010. When Debtor was contacted by counsel in this regards, Debtor stated he could not make that meeting and requested a rescheduling.

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7. Counsel rescheduled the meeting of creditors to November 29, 2010.
8. Subsequently, counsel spoke to Debtor over the phone and instructed him to bring any bank statements and tax returns to counsel's office so that those documents could be forwarded to the Chapter 7 trustee.
9. Debtor failed to produce any trustee documents to counsel and represented that he did not have a tax return because he did not make any money in 2009 and that he did not have any bank accounts.
10. On November 29, 2010, Debtor and counsel appeared together for the meeting of creditors in front of the chapter 7 trustee. At the meeting of creditors, Debtor represented that he had a 2009 tax return and that he had bank statements, but just not with him.
11. The Chapter 7 trustee, adjourned the meeting of creditors to December 27, 2010 to allow Debtor to procure the necessary documents.
12. During the period between November 29, 2010, and December 26, 2010, counsel made numerous phone calls and wrote two letters to Debtor in regards to these documents, requesting that Debtor produce them immediately or face possible certification for dismissal by the trustee.
13. All phone calls and letters went unanswered.
14. On December 27, 2010, Mr. Fred Rejali, Esquire was present at the meeting of creditors on behalf of counsel. Debtor failed to appear at the meeting of creditors and failed to produce any documents.
15. On December 29, 2010, counsel attempted to contact Debtor to no avail.

16. On February 2, 2011, counsel learned for the first time that Debtor filed a Motion to Pursue Other Counsel on January 12, 2011. Counsel was not aware of the pending motion or that a date for hearing had been set.

17. Debtor made certain representations to this Court and to counsel. Based on those representations, Debtor's counsel believes it is his ethical obligation to withdraw his representation. Furthermore, counsel has been unable to procure documents which were originally not in existence, then later came into existence.

WHEREFORE, the Debtor's counsel, Amir Raminpour, respectfully request that the Court grant his Motion to Withdraw as Counsel for Debtor and allow Debtor an opportunity to seek other counsel in this matter.

Respectfully submitted
By Counsel

By: /s/ Amir Raminpour
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CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing was sent via ECF and USPS 1st class mail to the Office of the United States Trustee, Jack Frankel, Esq., Chapter 7 Trustee, and to all creditors and parties in interest this 3rd day of February, 2011 on the attached service list.

/s/ Amir Raminpour